

Cardillo & Corbett
Attorneys for Defendant
ATLANTIC ORIENT LINE LTD.
29 Broadway
New York, New York 10006
Tel: (212) 344-0464
Fax: (212) 797-1212
Tulio R. Prieto (TP-8455)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
CROLIER SHIPPING LTD, :

Plaintiff, : **ECF**
-against- : **ANSWER & COUNTERCLAIM**
ATLANTIC ORIENT LINE LTD, : **08 Civ. 0053(RMB)**

Defendant. :
-----x

Defendant, ATLANTIC ORIENT LINE LTD. ("Defendant"),
by and through its attorneys, Cardillo & Corbett, as and for
its Answer to the Verified Complaint of plaintiff CROLIER
SHIPPING LTD. ("Plaintiff") alleges, upon information and
belief as follows:

1. Admits each and every allegation contained in
paragraph 1 of the Complaint.
2. Denies knowledge or information sufficient to
form a belief as to the truth of the allegations contained in
paragraph 2 of the Complaint.
3. Admits each and every allegation contained in
paragraph 3 of the Complaint.

4. Admits each and every allegation contained in paragraph 4 of the Complaint.

5. Admits each and every allegation contained in paragraph 5 of the Complaint.

6. Denies each and every allegation contained in paragraph 6 of the Complaint, except admits that Plaintiff delivered the vessel to Defendant under the charter party attached as Exhibit A to the Complaint.

7. Denies each and every allegation contained in paragraph 7 of the Complaint.

8. Denies each and every allegation contained in paragraph 8 of the Complaint, except admits that Plaintiff submitted a final hire statement to Defendant purporting to show a balance due to Plaintiff in the amount of \$430,744.57.

9. Denies each and every allegation contained in paragraph 9 of the Complaint.

10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint.

11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of the Complaint.

12. Denies each and every allegation contained in paragraph 12 of the Complaint, except admits that English law

and arbitration provide for the award of attorneys' fees to the successful litigant, along with costs, disbursements, the cost of arbitration and interest.

13. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 29 of the Complaint.

14. Denies each and every allegation contained in paragraph 30 of the Complaint.

15. Denies each and every allegation contained in paragraph 31 of the Complaint.

16. Denies each and every allegation contained in the second paragraph 31 of the Complaint.

17. Denies each and every allegation contained in paragraph 32 of the Complaint.

AS AND FOR DEFENDANT'S FIRST AFFIRMATIVE DEFENSE

18. Defendant repeats each and every denial, denial upon information and belief, admission and allegation made in paragraphs 1 through 17 of this Answer.

19. This Court lacks personal jurisdiction over Defendant.

AS AND FOR DEFENDANT'S SECOND AFFIRMATIVE DEFENSE

20. Defendant repeats each and every denial, denial upon information and belief, admission and allegation made in paragraphs 1 through 19 of this Answer.

21. Defendant reserves the right to submit the disputes arising under the charter party sued herein to arbitration in London.

AS AND FOR DEFENDANT'S COUNTERCLAIM

22. Defendant repeats each and every denial, denial upon information and belief and admission and allegation made in paragraphs 1 through 21 of this Answer.

22. As provided for in English law and arbitration, attorneys' fees are awarded to the successful litigant along with costs, disbursements, and the cost of arbitration.

23. Defendant estimates that the legal expenses and costs of defending the claims asserted by Plaintiff in this action and in London arbitration will be \$50,000.00.

24. Defendant respectfully requests that the Court order Plaintiff to establish counter-security for costs and attorneys' fees pursuant to Supplemental Rule E(2)(b) and (7)(a).

WHEREFORE, Defendant prays:

That this Court grant an order directing Plaintiff to establish counter-security for costs and attorneys' fees, and granting such other, further and different relief as the

Court may deem just and proper.

Dated: New York, New York
January 27, 2008

CARDILLO & CORBETT
Attorneys for Defendant
ATLANTIC ORIENT LINE LTD.

By: /s/Tulio R. Prieto
Tulio R. Prieto (TP 8455)

Office and P.O. Address
29 Broadway, Suite 1710
New York, New York 10006
Tel: (212) 344-0464
Fax: (212) 797-1212